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| 12 | Julie.odell@bryancave.com | | |
| 13 | Attorneys for Defendant ADECCO, USA, INC. | | |
| 14 | | | |
| 15 | IN THE UNITED STAT | TES DISTRICT COURT | |
| 16 | FOR THE NORTHERN DISTRICT OF CALIFORNIA | | |
| 17 | SAN JOSE | DIVISION | |
| 18 | RAJAN NANAVATI, on behalf of himself and | Case No.: 5:14-CV-04145-BLF | |
| 19 | all others similarly situated, and on behalf of the general public, | (Santa Clara Court No. 1-14-CV-269398) | |
| 20 | Plaintiff, | CLASS ACTION | |
| 21 | vs. | STIPULATION AND [PROPOSED] | |
| 22 | | ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE | |
| 23 | ADECCO USA, INC., and DOES 1 through 50, inclusive; | | |
| 24 | Defendants. | [Pursuant to Local Rules 7-12, 16.2(e)] | |
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| | Stipulation and [Proposed] Order Continuing Case Management Conference | | |

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| 1 | The parties, Plaintiff RAJAN NANAVATI ("Plaintiff") and Defendant ADECCO | |
| 2 | USA, INC., ("Defendant") by and through their respective counsel of record, do hereby agree | |
| 3 | and stipulate to the following: | |
| 4 | WHEREAS, a case management conference is scheduled in the above-listed action to | |
| 5 | take place on February 5, 2015; | |
| 6 | WHEREAS, the parties' Joint Case Management Conference Statement and Rule | |
| 7 | 26(f) report is currently due filed by January 29, 2015; | |
| 8 | WHEREAS, Plaintiff's lead trial counsel has a conflict with the current case | |
| 9 | management conference date; | |
| 10 | WHEREAS, a hearing is scheduled for March 26, 2015 on Defendant's pending | |
| 11 | Motion to Compel Arbitration, the outcome of which could impact the parties' proposed | |
| 12 | discovery and scheduling order deadlines in their Rule 26 report since it may result in some | |
| 13 | or all of the claims being stayed and/or compelled to arbitration; | |
| 14 | WHEREAS, in order to maximize the efficient use of the Court and Parties' time, the | |
| 15 | Parties wish to continue the initial Case Management Conference so that it coincides with or | |
| 16 | takes place after the March 26, 2015 hearing on Defendant's Motion to Compel Arbitration; | |
| 17 | IT IS THEREFORE STIPULATED BY THE PARTIES, THROUGH THEIR | |
| 18 | RESPECTIVE COUNSEL OF RECORD that, subject to Court approval, the case | |
| 19 | management conference be continued to a date on or after March 26, 2015, at the | |
| 20 | convenience of the Court. | |
| 21 | IT IS SO AGREED: | |
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| 23 | DATED: January 6 , 2015 Kevin R. Allen | |
| 24 | Velton Zegelman P.C. Attorneys for Plaintiff Class | |
| 25 | Autoriteys for Frankfir and Frankfir Class | |
| 26 | DATED: Julie E. Patterson | |
| 27 | Julie W/O'Dell BRYAN CAVE LLP | |
| 28 | Attorneys for Defendant | |
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| 1 | [PROPOSED] ORDER | |
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| 2 | PURSUANT TO GOOD CAUSE, THE COURT HEREBY ORDERS that the Case | |
| 3 | Management Conference, now scheduled for February 5, 2015 is continued and shall be scheduled | |
| 4 | to take place on April 23, 2015 at 1:30 -am/pm. | |
| 5 | IT IS SO ORDERED. | |
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| 7 | DATED: January 7 , 2015 Roll STATES HIDGE | |
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| | Stipulation and [Proposed] Order Continuing Case Management Conference | |